

Katherine C. Huibonhoa (SBN 207648)
Brandon Rainey (SBN 272341)
Annabel Pollioni (SBN 350579)
Duane Morris LLP
260 Homer Avenue, Suite 202
Palo Alto, CA 94301-2777
Telephone: +1 650 847 4150
Fax: +1 650 847 4151
E-mail: khuibonhoa@duanemorris.com
brainey@duanemorris.com
apollioni@duanemorris.com

Attorneys for Defendant
GOOGLE LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JALON HALL,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No.: 4:23-cv-06574-JST

STIPULATION TO STAY CASE

Complaint Filed: December 21, 2023

Trial Date: None Set

Defendant Google LLC (“Google”) and Plaintiff Jalon Hall (“Hall”) (collectively, the “Parties”), hereby submit this Stipulation to Stay this case for 30 days for all purposes and respectfully request that the Court extend the current deadlines as follows:

WHEREAS, Google filed its Motion to Dismiss Plaintiff’s Complaint on March 5, 2024 (ECF No. 12);

WHEREAS, on March 8, 2024, Hall filed an Opposition/Response to the Motion to Dismiss seeking a fourteen (14) day extension (from March 19, 2024 until April 3, 2024) of time to respond to the Motion to Dismiss and retain legal counsel (ECF No. 21), which the Court granted (ECF No. 22);

WHEREAS, on March 29, 2024, Hall contacted Google seeking its consent to a 30-day stay

1 this action for 30 days so that Hall could retain legal counsel;

2 WHEREAS, the Initial Case Management Conference was set for April 2, 2024 at 2:00 PM
3 (ECF No. 11), and has been reset for July 2, 2024 (ECF No. 26);

4 WHEREAS, the Parties' General Order No. 71 Disclosures are due April 4, 2024 (ECF No.
5 2);

6 WHEREAS, the Hearing on Google's Motion to Dismiss is set for May 2, 2024 at 2:00 PM
7 (ECF No. 19);

8 WHEREAS, the parties desire to stay this action for 30 days to afford Hall an opportunity to
9 retain legal counsel;

10 NOW THEREFORE, subject to the Court's approval, the Parties hereby stipulate and agree
11 that this action should be stayed for 30 days and all deadlines be extended as follows:

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Event	Prior Deadline	New Deadline
Opposition to Motion to Dismiss	April 3, 2024	May 3, 2024
Reply in Support of Motion to Dismiss	April 10, 2024	May 10, 2024
Parties General Order No. 71 Disclosures	April 4, 2024	May 6, 2024

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18 The Parties respectfully request that the Court extend these deadlines and reset the Motion to
19 Dismiss hearing at the Court's earliest convenience by signing and entering the concurrently
20 submitted Proposed Order to Stay this Case and Extend Pending Deadlines Pursuant to Stipulation of
21 the Parties.
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1 Dated: April 1, 2024

DUANE MORRIS LLP

2
3 By: /s/Katherine Huibonhoa

KATHERINE C. HUIBONHOA

Attorneys for Defendant

GOOGLE LLC

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5 Dated: April 1, 2024

JALON HALL

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7 By: /s/Jalon Hall

Jalon Hall, *Pro Se*